

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
Squirrels Research Labs LLC, <i>et al.</i> ¹)	Case No. 21- 61491
)	
Debtors.)	(<i>Jointly Administered</i>)
)	
)	Judge Tiiara N.A. Patton
)	

**MOTION OF SQUIRRELS RESEARCH LABS LLC AND THE MIDWEST DATA
COMPANY LLC TO LIMIT SERVICE OF THEIR SECOND REPLY IN SUPPORT OF
THEIR MOTION FOR ENTRY OF AN ORDER APPROVING COMPROMISE AND
SETTLEMENT WITH CINCINNATI INSURANCE COMPANY**

Squirrels Research Labs LLC (“SQRL”) and The Midwest Data Company LLC (“MWDC”, collectively with SQRL, the “Debtors”), by and through undersigned counsel, hereby move the Court to limit service of their Second Reply (the “Reply”) in Support of Motion of Squirrels Research Labs LLC and The Midwest Data Company for the Entry of an Order Approving Compromise and Settlement with Cincinnati Insurance Company filed contemporaneously herewith. In support of this Motion, the Debtors respectfully state the following:

1. The Motion to Compromise was filed on April 9, 2024 and served on all creditors and parties in interest, as set forth on the certificate of service, along with a Notice of the deadline to object and the date of a hearing on the Motion to Compromise [Docket ## 323, 326].

¹ The “Debtors” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

2. The objection deadline passed on May 2, 2024. The only timely filed objection is that of Second Foundation Mining LLC by and through the CEO, Robert Oxsen, of Second Foundation Mining LLC.

3. On or about May 8, 2024, Paul Billinger filed an objection after the deadline for doing so had passed.

4. No other objections have been filed with the Court.

5. The list of all creditors and parties in interest is extensive, and includes entities and individuals in foreign jurisdictions. Mailing a copy of the Reply to all of those creditors and parties in interest would be expensive and burdensome to the estate. The Debtors submit that cause exists to limit notice of the Reply to (1) Paul Billinger, by email to paul.billinger@toreaconsulting.com, (2) Torea Consulting, by regular mail, to Torea Consulting, Attn: Paul Billinger, 1 Bow Street, Stouffville, ON L4A 1Z3 Canada, and (3) electronically to all parties listed on the Court's Electronic Mail Notice List, including the United States Trustee. The Debtors believe limiting service of the Reply to these parties is appropriate and adequate service and provides fair and reasonable notice.

WHEREFORE, the Debtors respectfully request the Court enter an Order substantially in the form attached hereto as Exhibit A, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

Dated: May 15, 2024

Respectfully submitted,

/s/ Julie K. Zurn

Marc Merklin (0018195)

Julie K. Zurn (0066391)

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CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2024, a true and correct copy of the Motion of Squirrels Research Labs LLC and the Midwest Data Company LLC to Limit Service of Their Second Reply In Support of Their Motion for Entry of an Order Approving Compromise and Settlement With Cincinnati Insurance Company, was served via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

John C. Cannizzaro on behalf of Interested Party Instantiation LLC at
John.Cannizzaro@icemiller.com, Kelli.Bates@icemiller.com

Nicholas Paul Capotosto on behalf of Debtor Squirrels Research Labs LLC at
ncapotosto@brouse.com, tpalcic@brouse.com

Christopher Paul Combest on behalf of Creditor Avnet, Inc. at christopher.combest@quarles.com

Jack B. Cooper on behalf of Defendant Squirrels LLC at jcooper@milliganpusateri.com

Jack B. Cooper on behalf of Defendant Andrew Gould at jcooper@milliganpusateri.com

Jack B. Cooper on behalf of Defendant David Stanfill at jcooper@milliganpusateri.com

Jack B. Cooper on behalf of Defendant Jessica Gritzan at jcooper@milliganpusateri.com

Jack B. Cooper on behalf of Defendant Kyle Slutz at jcooper@milliganpusateri.com

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David M. Neumann on behalf of Creditor Torea Consulting Ltd. at dneumann@meyersroman.com, docket@meyersroman.com; mnowak@meyersroman.com

Christopher Niekamp on behalf of Creditor Better PC, LLC at cniekamp@bdblaw.com

Matthew T. Schaeffer on behalf of Creditor Fleur-de-Lis Development, LLC at mschaeffer@baileycav.com, lpatterson@baileycav.com

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Bryan Sisto on behalf of Creditor Carl Forsell at bsisto@fbtlaw.com

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Joshua Ryan Vaughan on behalf of Creditor Ohio Bureau of Workers Compensation at jvaughan@amer-collect.com, SAllman@AMER-COLLECT.COM; HouliECF@aol.com

Julie K. Zurn on behalf of Debtor Squirrels Research Labs LLC at jzurn@brouse.com, tpalcic@brouse.com; ckeblesh@brouse.com

Julie K. Zurn on behalf of Debtor The Midwest Data Company LLC at jzurn@brouse.com, tpalcic@brouse.com; ckeblesh@brouse.com

Julie K. Zurn on behalf of Plaintiff Squirrels Research Labs LLC at
jzurn@brouse.com, tpalcic@brouse.com; ckeblesh@brouse.com

Kate M. Bradley ust44 on behalf of U.S. Trustee United States Trustee at
kate.m.bradley@usdoj.gov

And by email to: paul.billinger@toreaconsulting.com

And by Regular U.S. Mail to:

Torea Consulting
Attn: Paul Billinger
1 Bow Street
Stouffville, ON L4A 1Z3
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/s/ Julie K. Zurn
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